

ENABLEPAY GLOBAL AML/CFT & SANCTIONS COMPLIANCE POLICY

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Governing Jurisdictions: FINTRAC (Canada), FinCEN (USA), FATF Global Standards, CBN/NFIU (Nigeria)

1. STATEMENT OF POLICY & REGULATORY ALIGNMENT

Enablepay INC (Delaware, USA) and its operating subsidiary Enablepay Nigeria Limited (collectively "EnablePay") maintain a rigorous, institutional-grade compliance framework designed to prevent Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF).

Operating as a regulated Money Services Business (**FINTRAC MSB #N300001868**) in North America, and as a licensed lending entity in Nigeria, EnablePay aligns its controls with the Financial Action Task Force (FATF) 40 Recommendations and the US Bank Secrecy Act (BSA). This framework enforces a zero-tolerance policy toward financial crime across all cross-border stablecoin settlements and domestic invoice discounting operations.

2. RISK-BASED APPROACH (RBA)

EnablePay utilizes a strictly business-to-business (B2B) operational model. We deal exclusively with verified corporate supply chains anchored by Tier-1 multinational corporations (e.g., Unilever, Coca-Cola). Because EnablePay does not process retail peer-to-peer (P2P) transfers, our baseline risk profile is inherently lower than standard consumer VASPs. However, our RBA dictates distinct risk categorizations:

- **Low Risk:** Domestic invoice discounting (Prime) for verified, legacy suppliers of Tier-1 Anchor Corporates within local fiat rails.
- **Medium Risk:** Cross-border stablecoin settlements (Nexus) to established manufacturing jurisdictions (e.g., China, India) requiring enhanced transaction monitoring.
- **Prohibited (Zero Tolerance):** Shell companies, unregistered MSBs, retail/individual consumers, darknet market interactions, and entities operating in comprehensively sanctioned jurisdictions (e.g., Iran, North Korea, Russia).

3. KNOW YOUR BUSINESS (KYB) & ULTIMATE BENEFICIAL OWNERSHIP (UBO)

Before any facility is disbursed or stablecoin settlement is routed via the Delaware HoldCo, institutional-grade Corporate Due Diligence must be executed.

1. **Corporate Identity:** Algorithmic and manual verification of Certificates of Incorporation, Memorandums of Association, operating licenses, and tax identification numbers.
2. **UBO Identification:** Mandatory identification and identity verification (KYC) of all natural persons holding 25% or more equity or voting rights in the borrowing entity.
3. **Commercial Validity (Proof of Life):** Verification of the entity's commercial existence via direct API checks or manual validation against the Anchor Corporate's internal vendor databases.
4. **Enhanced Due Diligence (EDD):** Applied to entities operating in higher-risk sectors or those with Politically Exposed Persons (PEPs) in their executive structure. EDD requires senior compliance officer sign-off and enhanced Source of Wealth / Source of Funds (SoW/SoF) validation.

4. GLOBAL SANCTIONS & PEP SCREENING

EnablePay utilizes automated, real-time API integrations with Tier-1 compliance data providers to screen all corporate clients, UBOs, and overseas settlement beneficiaries against global watchlists prior to onboarding and continuously thereafter.

Mandatory Watchlists Screened:

- US Treasury OFAC (SDN and Non-SDN lists)
- UN Security Council Consolidated List
- Canadian OSFI / FINTRAC Directives
- UK HMT / EU Consolidated Lists
- Nigeria NFIU / CBN Watchlists

Policy Directive: Any exact or highly probable probabilistic match results in an immediate, automated hard-stop of the transaction or onboarding process, pending manual resolution by the Chief Compliance Officer (CCO).

5. VIRTUAL ASSET COMPLIANCE & FATF TRAVEL RULE

EnablePay utilizes USD-backed stablecoins (USDC) exclusively for cross-border liquidity routing. As a FINTRAC-regulated entity engaging in Virtual Asset transfers, we strictly adhere to FATF Travel Rule requirements.

1. **Travel Rule Enforcement:** EnablePay ensures that required originator and beneficiary data travels immediately and securely with all digital asset transfers exceeding the 1,000 USD/CAD equivalent threshold, utilizing compliant interoperability protocols when interfacing with external VASPs.
2. **On-Chain Analytics & Wallet Screening:** All external, unhosted wallets interacting with EnablePay's corporate multi-sig smart contracts are continuously screened via industry-leading blockchain analytics software (e.g., Chainalysis KYT, TRM Labs).
3. **Illicit Finance Blocking:** Inbound or outbound funds associated with high-risk on-chain entities (e.g., mixers, tumblers, sanctioned addresses, or known ransomware clusters) are automatically rejected or quarantined at the smart contract level.

6. TRANSACTION MONITORING & SUSPICIOUS ACTIVITY REPORTING (SAR/STR)

The Compliance Desk conducts ongoing monitoring of all fiat and stablecoin flows to detect unusual patterns deviating from the client's established commercial profile.

Automated Red Flags Include:

- Invoice requests drastically inconsistent with the supplier's historical Anchor volume.
- Requests to route stablecoins to unrelated third-party overseas beneficiaries without valid proforma invoices.
- Sudden changes in corporate directorship or UBOs immediately preceding large capital drawdowns.

When reasonable suspicion of money laundering, terrorist financing, or sanctions evasion is identified, the CCO will file a Suspicious Activity Report (SAR) / Suspicious Transaction Report (STR) with the appropriate Financial Intelligence Unit (e.g., FINTRAC in Canada, NFIU in Nigeria) within the statutory deadlines. **Tipping off the client is strictly prohibited and constitutes a criminal offense under global law.**

7. RECORD KEEPING, AUDIT & INDEPENDENT REVIEW

- **Retention Policy:** All KYB documents, transaction ledgers, fiat bank receipts, on-chain transaction hashes, and internal compliance memos are retained securely (encrypted at rest) for a minimum of **seven (7) years** following the termination of the business relationship or execution of the transaction.
- **Independent Audit:** The AML/CFT program is subject to an independent, third-party audit annually by a qualified firm to test the adequacy of the policies, procedures, and smart-contract internal controls.

APPROVED BY THE BOARD OF DIRECTORS Enablepay INC (Delaware) & Enablepay Nigeria Limited